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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the application of)
)
Sheth et al.)
)
Application No. 10/090,261) Examiner: Unassigned
)
Filed: March 1, 2002) Docket No. NAI1P100_01.314.01
)
For: SYSTEM, METHOD AND)
COMPUTER PROGRAM PRODUCT FOR) Date: April 30, 2002
TRANSLATING SNMP (ASN.1))
PROTOCOL DECODES)

official

5/14/03

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Commissioner of Patents and Trademarks, Washington, DC 20231 on April 30, 2002.

Signed: Erica L. Mann
Erica L. Mann

Commissioner for Patents
Washington D.C. 20231

PETITION TO MAKE SPECIAL
37 C.F.R. 1.102 and MPEP § 708.02(VIII)

Sir:

1. Petition – MPEP § 708.02(VIII)(A):

Applicant hereby petitions to make this new application special. This application has not received any examination by the Examiner.

2. Fee

A check for the petition amount has been included. The Office is authorized to charge any additional fees for this petition to Deposit Account No. 50-1351 (Order No. NAI1P100).

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3. Claims -- MPEP § 708.02(VIII)(B)

All of the claims in this case are directed to a single invention. If the Office determines that all of the claims presented are not directed to a single invention, then applicant will make an election without traverse as a prerequisite to the grant of special status.

4. Searches and Declaration – MPEP § 708.02(VIII)(C)

As the undersigned practitioner, being duly registered to practice before the U.S. Patent and Trademark Office, I declare that a careful and thorough pre-examination search of the prior art has been made.

The classes and subclasses searched include at least:

395/all subclasses

The terms used in defining the search include:

"decode", "text", "alphanumeric," "translate," "protocol," etc.

The resulting potential references were reviewed for their degree of relevancy to the present invention.

5. Discussion of Related References --MPEP § 708.02(VIII)(D) and (E)

A copy of each of the references deemed most closely related to the subject matter of the claimed invention is submitted herewith in a form PTO-1449.

(1) (3) PCT Publication WO9914891A2 by Schmidt et al., issued March 25, 1999 (hereinafter "Schmidt")

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The present patent application discloses a development system comprising reuseable computer implemented components to be used in conjunction with a hardware network interface board, for emulation of devices in a functioning network. The same components can provide tools for stimulation and analysis of network traffic and compliance verification. The components provide an interface between a client program and the network interface hardware. They include a protocol database, in which application-level protocols specific to devices such as CD changers, amplifiers and audio-video control units are defined. The proposed tools offer a mechanism for filtering commands instructed by the user (client program), where these conflict with application protocols defined for the specific type of device being emulated. The components include program modules for automatic implementation of standard behaviors, such as network management and source data connection routing. In addition to application protocols generic to all network configurations employing a certain protocol, the tools may store a network system description defining the particular number and type of devices present or emulated on the network, to restrict further the range of legal commands. Below are pertinent excerpts from Schmidt:

> "Another feature of the ARS is the symbolic translation of messages. Each D213application protocol message, for example, are specified as an Opcode and a number of operands. **This is a very unintuitive representation to an end user, as it is complicated, and is difficult to remember the meaning of a string of digits. To alleviate this, the novel development system can translate 13213 messages into a human readable textual representation, and vice-versa.** This service is provide by the ARS object 828. Thus client application 81 0 can specify aD213 Optical message to be transmitted in text, and the ARS object will convert the text into the corresponding D213 Optical message. Similarly D213 messages received by tile ARS object can be converted into text before being propagated up to the client application. Textual translation in the ARS can be turned on or off by a function in its API." (emphasis added)

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Schmidt thus teaches an automatic response system (ARS) for translating digits into human-readable text. Such digits, however, are limited to the context of messages (i.e. application protocol messages). It should be noted that Schmidt defines such messages in the following excerpt:

> "However, the development system components and client applications deal with the concept of D213 application protocol messages, not control frames. AD213 application protocol message contains the real semantics of a message (the meaning),whereas the control frame structure is simply a communication format imposed on application protocol messages by the transceiver hardware."

Applicant thus contends that the system of Schmidt fails to meet applicant's claimed "receiving a plurality of frames," "decoding the frames in order to generate" "protocol decode objects" / "SNMP decode objects," and translating "to a textual identifier;" since applicant's claimed protocol/SNMP decode objects (as defined in the claims) are simply not met. Moreover, Schmidt does not teach the claimed enabling techniques found in independent claims 21-23.

(2) U.S. Pat. No 5,680,585 by Bruell, issued Oct. 21, 1997 (hereinafter "Bruell")

Bruell teaches a packet description language which is declarative in nature and suitable for efficiently and flexibly defining data packet formats in accordance with internetwork routing device uses. Data packet formats may be defined utilizing the packet description language and then compiled to create a data structure corresponding to the defined data packet format. A routing device test platform may generate test data packets and decode received test packets by referencing the test data to the compiled data structure defined in accordance with the packet description language. The declarative language provides for assigning numerous default values and attributes to packet fields such that only a small

amount of data need be specified when regression testing a new routing device. Below are pertinent excerpts from Bruell.

> "The processor block 102 then executes a compiler program which translates the data packet format definition as entered by the computer user into a data structure which may be referenced by other programs." (Emphasis added)

> "The PDL compiler 401 is a compiler constructed in accordance with the declarative structure of the PDL language for generating PDL data structures 405 which may be referenced by the test application routines of the device test environment 301." (Emphasis added)

Bruell thus discloses the translation of data into a data structure [i.e. packet description language (PDL) data structure] which is capable of being "referenced by other programs." In sharp contrast, applicant teaches and claims (in each of the independent claims) translating "to a textual identifier" and "displaying each textual identifier...for facilitating the use" of the protocol/SNMP decode objects during network analysis," a combination of features found nowhere in the prior art for such a specific purpose. Still yet, Bruell does not teach the related enabling techniques found in independent claims 21-23.

(3) PCT Publication WO9746010A1 by Blatter, et al., issued Dec. 4, 1997 (hereinafter "Blatter")

In the system of Blatter, a decoding method minimizes the use of incorrect program specific information (PSI) parameters across program boundaries and provides default video and audio outputs for reproduction during error conditions. Program representative packetized datastreams incorporating PSI suitable for use in recovering data content of the program are decoded. PSI packets in the datastream are identified and a parameter within the identified PSI data is used to determine whether the identified PSI data is to be used for decoding the program

content, irrespective of previous PSI content. Current PSI is updated with the identified PSI data in response to the parameter. Program content packets are identified using the current PSI. The program content packets are assembled into a decoded datastream using the current PSI. The current PSI may also be updated with the identified PSI data irrespective of the content of the identified PSI data, provided that there is an absence of a PSI content error indication. Also packets representing default program content are assembled into the output datastream, in response to a PSI validity indication provided by a control parameter in the packetized datastream. Below is a pertinent excerpt from Blatter.

> "Table IPID name PID Definition Descriptionbase+offset(Hex) Program IPMT 0400 PID for program map table - base" (Emphasis added)

Blatter teaches the use of a mapping table for mapping identifiers which is vastly departed from that of applicant's. In sharp contrast, applicant teaches and claims "receiving a plurality of frames," "decoding the frames in order to generate" "protocol decode objects" / "SNMP decode objects," and translating "to a textual identifier." In a similar manner, Blatter does not teach the related enabling techniques found in independent claims 21-23. For example, there is no mention of the compilation of a list of management information bases (MIB's) as claimed in claims 21-22, or the correlation involving textual identifiers in claim 23.

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6. Conclusion

Applicant believes that this Petition to Make Special has met all requirements set forth by 3 7 C.F.R. 1.102 and MPEP § 708. 02(VIII), and respectfully requests that this Petition to Make Special be granted.

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Respectfully Submitted,

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